

Kuehn, Ginny -KC-7

From: L Brenner [brennerl@hotmail.com]
Sent: Monday, September 03, 2001 12:45 PM
To: lcdriessen@bpa.gov
Subject: Cedar & Raging River Watersheds

RECEIVED BY BPA
PUBLIC INVOLVEMENT

LOG#: KLT-371

RECEIVED: SEP 04 2001

I am writing as a former citizen of Seattle (I currently live in Amsterdam) to say that it is heartbreaking that once again something is being proposed that will cause unneeded damage to the amazing country of the Pacific Northwest. I want to support the idea of adding circuits to existing towers in the existing corridor. I want to insist that all damage to forest and wetland be repaired. I want to ask that a new EIS be filed.

We cannot ever estimate the damage actions like the proposed one will do. We can estimate what we can STOP from happening. Please take preventative action NOW

Thank you

Lise Brenner
Zocherstraat 38hs
1054 LZ Amsterdam

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Monday, September 03, 2001 9:10 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: <no subject>, Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT

LOG#: KLT-372

RECEIVED: SEP 04 2001

-----Original Message-----

From: Midge Brenner [mailto:midgeb@u.washington.edu]
Sent: Monday, September 03, 2001 2:11 PM
To: lcdriessen@bpa.gov
Subject: <no subject>

To Lou Driessen, Project Manager
Bonneville Power Administration

Dear Mr. Driessen:

I have just learned--with alarm--that Bonneville Power Administration has plans to cut old-growth forest, to clearcut a new corridor within the Cedar River Watershed for its new Kangley-Echo Lake Transmission Line Project. This would impact several wetlands and important salmon fisheries in Raging River, as well as the work being done by the city of Seattle to re-establish salmon in the Cedar River.

I am writing to urge the BPA to stop this planning immediately. Instead, the BPA could improve the existing corridor by adding additional circuits to the towers already there. If any forest or wetlands outside the existing corridor are to be damaged, they should be replaced. But before any action by the BPA, a new Environmental Impact Statement is needed. This should include all necessary information that presents alternatives including conservation, and that provides a substantial cumulative effects analysis.

Please respect the importance to all of us of preserving low elevation forests, particularly Seattle's watershed forests.

Sincerely,
Midge Brenner
2020 - 23rd Avenue E.
Seattle, WA 98112

Kuehn, Ginny -KC-7

From: Doug Schuler [douglas@scn.org]
Sent: Monday, September 03, 2001 10:13 AM
To: comment@bpa.gov; lcdriessen@bpa.gov
Subject: Bonneville Power clearcuts

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KE17-373
RECEIVED: E:
SEP 04 2001

Lou Driessen, Project Manager
Bonneville Power Administration
Portland, Oregon

Dear Mr. Driessen:

I am deeply concerned about the clearcut that the Bonneville Power Administration proposes to make within the Cedar River Watershed. Instead, why not improve the existing corridor? Bonneville could add additional circuits to the towers in the present corridor instead of clearcutting for a new corridor. In any case, an Environmental Impact Statement that includes conservation options is absolutely essential.

Sincerely,

Doug Schuler and Terry Frankel
Seattle

Kuehn, Ginny -KC-7

From: Tracy Jenkins [tjenkins@pol.net]
Sent: Friday, August 31, 2001 11:27 AM
To: lcdriessen@bpa.gov
Cc: comment@bpa.gov
Subject: Raging Cedar Powerline

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KE17-374
RECEIVED: E:
SEP 04 2001

As a resident of the Northwest who lives here for the majesty and beauty of its forests, I am concerned about the casual and rapid destruction of the few remaining wildlands. The cedar river watershed is protected from logging by public request. Because the decision to damage ancient forests and wetlands is irreversible, and there is so little of the original forest left to protect, we need to go to great lengths to protect the remaining forests and wetlands. This is a priority that the public has already supported. PLEASE consider adding circuits to the existing power lines. If additional lines are necessary please minimize the width of destructive clearcut, and please replace lands impacted by the construction. The current EIS does not adequately address cumulative effects and alternatives to new lines. Please commission a new EIS with alternatives and long term cumulative effects addressed. These are critical decisions for the long term health and beauty of our northwest ecosystem. Let's not make them hastily.

Sincerely,
Tracy Jenkins, MD
3110 NW 75th St.
Seattle, WA 98117

Kuehn, Ginny -KC-7

From: Megan Kelso [megan@girlhero.com]
Sent: Sunday, September 02, 2001 6:02 PM
To: lcdriessen@bpa.gov
Subject: new BPA powerlines

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-375 RECEIPT DATE: SEP 04 2001
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Dear Mr. Dreissen,
I'm writing to ask that you reconsider the new powerline corridor you are planning that will cut through the Cedar and Raging River watersheds. This would cause significant and adverse environmental impact to fragile and valuable and PROTECTED forests and wetlands. Please consider adding additional circuits to towers in the already existing corridor. I don't believe your EIS provides enough information about the cumulative effects of this new corridor, nor does it propose any viable alternatives. I think there should be a new EIS which provides this information. As a citizen of Washington state, I care deeply about our environment and saving the salmon and old growth forest. We all need to try really hard to think in the long term about how to save these resources. I appreciate your consideration of this matter.

thanks
Megan Kelso
citizen member of Pacific Crest Biodiversity Project

Kuehn, Ginny -KC-7

From: Judy Lightfoot [jlight@u.washington.edu]
Sent: Monday, September 03, 2001 9:41 AM
To: lcdriessen@bpa.gov; comment@bpa.gov
Subject: Proposed BPA clearcut

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-376 RECEIPT DATE: SEP 04 2001
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Card for Judy Lightfoot

Dear Mr. Dreissen,
I am deeply concerned about the clearcut that the Bonneville Power Administration proposes to make within protected watersheds. Instead, why not improve the existing corridor? Bonneville could add additional circuits to the towers in the present corridor instead of clearcutting for a new one. In any case, before permitting BPA to act, demand a new Environmental Impact Statement that includes all necessary information (the present one is insufficient), that presents alternatives including conservation, and that provides a substantial cumulative effects analysis. Finally, BPA should be made responsible for replacing any forest or wetlands that are damaged in the course of this new work.
Sincerely,
Judy Lightfoot, PhD

Kuehn, Ginny -KC-7

From: Bruce Pringle [pringb@compuserve.com]
Sent: Monday, September 03, 2001 10:44 AM
To: Lou Driessen; Communications
Subject: Comment on DEIS on the Raging Cedar Powerline

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KFLT-377
RECEIPT DATE: SEP 04 2001

Lou Driessen, Project Manager
Bonneville Power Administration - KC-7
Portland, Oregon

Subject: Comment on Draft Environmental Impact Statement on Raging Cedar Powerline

Dear Project Manager Driessen:

The Cedar River watershed has been given protection from logging, since it is important in protecting the city water supply. The proposed new powerline in the Cedar River and Raging River areas will remove trees and undergrowth from areas as far as 200 feet from the towers. Disturbing these valuable forests will damage wetlands and interfere with salmon habitat.

The current Environmental Impact Statement does not give adequate consideration to the possibility of using existing corridors for the new lines. It does not consider the cumulative effect over time of the proposed project. It does not provide for replacing damaged forests and wetlands.

We have already lost most of our wild areas. Please do more to protect this one.

Sincerely,

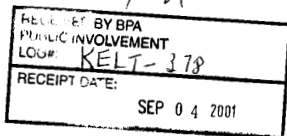
Bruce Pringle
17037 12th Place SW
Normandy Park, WA 98166

Harry Romberg
11538 17th Ave. N.E.
Seattle, WA 98125-5112

*I'm follow-up to my
e-mailed comments*

HR

September 3, 2001



Mr. Lou Driessen
Project Manager
Bonneville Power Administration
PO Box 3621
Portland, OR 97208

Dear Mr. Driessen:

I am a lifetime 50+ year resident of the Puget Sound region and 33 year resident of Seattle. I commented extensively both orally and in writing on the Habitat Conservation Plan for the Cedar River Watershed and was deeply involved in what I believe to have been an incredible outcome, the full protection of the watershed. I am deeply disturbed by the current proposal known as the Kangley-Echo Lake Transmission Line Project and would thus like to comment.

I oppose the project as it currently is proposed and think that it must either be significantly modified or terminated altogether. As I'm assuming the latter option is not your preferred course of action, I urge the BPA to amend the current proposal to make it more environmentally responsible. The City of Seattle had remarkable foresight in deciding to protect the watershed as fully as it did and gave up a great deal in the way of profit and the offsetting of operating costs in doing so. This transmission project diminishes that decision and threatens some of the environmental benefits sought in deciding on such a progressive HCP.

I have very serious reservations about the necessity of the proposed Kangley-Echo Lake Transmission Line and strong objections to many features of this project. In particular, I believe that the Draft EIS did not adequately consider increased energy conservation, which could negate the need for the additional power lines. The City of Seattle has a strong history of energy conservation, and other utilities in this area also have strong conservation programs. Increased energy conservation saves the individual ratepayers utility costs and could eliminate the capital cost of this project and the environmental damage that will result. Whereas conservation may not be adequate to meet all of the long range energy needs of the region, it certainly plays an important role and cannot be ignored in any comprehensive view of local energy needs and solutions. It should therefore not be overlooked when determining the needs and indeed the need for this project.

I am deeply concerned by the increased swath of forest that must be cut for the transmission lines and the necessity to build roads to accommodate it. BPA contends that the impact on the forest would be negligible but I would argue that it is considerable. While Seattle is working hard to provide excellent low elevation habitat in the area and diminish road capacity within the watershed, this project does just the opposite. Not only do roads, staging areas, harvesting of trees and other construction activities impact the boreal habitat but they affect the very reason for the existence of a protected watershed; that is, providing high quality water to the local population, oddly enough the same people for which you wish to provide additional transmission capacity. I think that in this case the higher quality water is more important than the added electricity.

BPA should be viewing this project with the goal of not compromising the Cedar River Watershed HCP as is the current case. In the event that additional transmission lines are required, I believe that BPA should take a much harder look at placing additional lines on the existing towers or accommodating them in some way in the existing corridor. BPA asserts that new transmission lines are required because of the possibility of damage to the existing towers. However, in my opinion, that possibility is negligible. Certainly the cost of reinforcing and strengthening the existing towers in various ways would be substantially less than the cost of the proposed project. In addition, accommodating the new lines in the existing corridor would likely reduce the number and size or even eliminate the need for the currently planned construction staging areas which would further impact the watershed

The Draft EIS does not adequately consider the very serious environmental effects from this project. The project would require 1.5 miles of new road construction through the Cedar River Watershed and the Raging River Watershed. New roads are very likely to cause soil erosion and resulting damage to water quality and fisheries resources. Additional roads also cause fragmentation and have severe impacts on wildlife in these watersheds. Although the DEIS Summary seems to infer that the road rights-of-way would only require clearing for about 75 feet, in fact, cutting of trees can be as far as 200 feet from the power line (DEIS pages 2-5). Further, the roads would impact several wetlands. In light of the enormous amounts of money that the City of Seattle and many state and federal agencies are spending to protect wetlands and salmon habitat, this additional road construction is unwise as well as unnecessary. This is especially crucial when one considers the high likelihood that during a project of this scale, there will undoubtedly be fuel spills, oil leaks and other accidental but very serious incidents that will have a major effect. As a further critical factor, the BPA should commit itself not to use herbicides in the Raging River Watershed, which contains important salmon runs.

Further, the DEIS does not adequately consider BPA's duty to mitigate if the project proceeds with the Preferred Alternative. Lowland forests are a critical ecological element in the Western Cascades. The Cedar River Watershed contains an unusually large block of old growth. It also contains second growth that now has the possibility of maturing into old growth as a result of the Cedar River HCP. This project, with a right of way up to 200 feet from the power line, would cause serious fragmentation through this forest ecosystem. Mitigation should include replacement habitat, including forests and wetlands, which should be in close proximity to the area that is disturbed. To the extent that local areas are not used for mitigation, the area of mitigation should be increased as the mitigation moves in distance. If mitigation is employed, the BPA should look at several close by areas in Green River, Raging River, near Selleck, and upper Rock Creek Valley.

Further mitigation should include but not be limited to the height of any transmission lines crossing the Cedar and Raging Rivers should be high enough to allow late successional forest to grow to 200' tall in the riparian zone of the river, and adjacent slopes. Given the topography on either side of the river, that should be feasible. The height of the towers should be increased if necessary.

Roads outside of cleared powerline right of way should be eliminated. Helicopters and/or trails to access those sites should be used instead. Any roads constructed should be offset by eliminating roads elsewhere in the watershed. No staging area should be allowed inside the watershed.

Furthermore, the DEIS fails to address cumulative impacts of this and other similar projects. Particularly when one looks at this in conjunction with existing transmission lines, the impact to forests and wildlife corridors becomes more than a little significant. In fact, this project degrades wildlife corridors in this critical ecological connection to Tiger Mtn. and Rattlesnake Ridge.

Whereas the current project will significantly affect the watershed, another route through the watershed would be far worse. Thus, I would strongly object to this course of action.

I believe has a long ways to go to adequately study the impacts of this project and the solutions to these and other serious problems. The Draft EIS lacks important site specific information on the location of towers, roads, and staging areas. It's analysis of streams and fisheries is inadequate. The cumulative affects analysis is essentially non-existent. The DEIS fails to consider a full range of alternatives. A supplemental Draft EIS should be produced and a broader public involvement process implemented.

I look forward to commenting on an improved supplemental DEIS which address these and other concerns that the current DEIS fails to address or addresses inadequately.

Sincerely,



Harry Romberg

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT

LOG#: **KELT-379**

RECEIPT DATE:

SEP 04 2001

From: Peter Roth [peterbroth@yahoo.com]
Sent: Sunday, September 02, 2001 4:05 PM
To: lcdriessen@bpa.gov; comment@bpa.gov
Subject: Raging Cedar Powerline/Kangley-Echo Lake Transmission Line Project comment

To Lou Driessen:

I would like to comment on Raging Cedar Powerline/Kangley-Echo Lake Transmission Line Project proposal.

While I support the addition of circuits to towers in the existing corridor, I must insist that any forest or wetlands that are damaged be adequately replaced. This requires a comprehensive Environmental Impact Statement (EIS) with a substantive analysis of ALL cumulative effects of any changes to the ecosystem. Included in this EIS should be alternatives that require NO environmental destruction. These non-destructive alternatives are the most important part of the EIS because they would require the least amount of effort and resources to implement.

Thank you for taking the time to read my input.

Sincerely,

Peter Roth
7415 - 5th Ave NE #208
Seattle WA 98115-5370

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT

LOG#: **KELT-380**

RECEIPT DATE:

SEP 04 2001

From: Kpthomas1@aol.com
Sent: Sunday, September 02, 2001 8:02 AM
To: lcdriessen@bpa.gov; comment@bpa.gov
Subject: Proposed Powerline in Cedar and Raging River watersheds

Bonneville Power Administration,

I am writing to voice my opposition to the proposed nine miles of new powerline which the BPA is considering building in the Cedar and Raging River watersheds. These areas should not be subject to the road-building and clear-cutting which the installation of new powerlines would entail.

Any new lines should be placed on already existing towers, to minimize damage to the forests in the watersheds. Any damage done to forests or wetlands by the installation of new powerlines should be replaced.

Our watersheds and forests require protection now and in the future. Please do not build new powerlines.

Sincerely,

Karen P. Thomas
4435 First Avenue NW
Seattle, Washington 98107

Kuehn, Ginny -KC-7

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KE6T-381

From: bweeks [bweeks@quidnunc.net]
Sent: Monday, September 03, 2001 10:26 AM
To: lddriessen@bpa.gov; coment@bpa.gov
Subject: BPA-Cedar River

RECEIPT DATE:

SEP 04 2001

Dear Mr. Dreissen,

I am deeply concerned about the clearcut that the Bonneville Power Administration proposes to make within the Cedar River Watershed. Instead, why not improve the existing corridor? Bonneville could add additional circuits to the towers in the present corridor instead of clearcutting for a new corridor. In any case, before permitting BPA to act, demand a new Environmental Impact Statement that includes all necessary information (the present one is insufficient), that presents alternatives including conservation, and that provides a substantial cumulative effects analysis. Finally, BPA should be made responsible for replacing any forest or wetlands that are damaged in the course of this new work.

Sincerely,
Robert R Weeks

SIERRA CLUB

Cascade Chapter
8511 - 15th Ave. NE
Seattle, Washington 98115

September 3, 2001

Lou Driessen, Project Manager
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-382</i>
RECEIPT DATE: SEP 04 2001

Re: Kangley-Echo Lake Transmission Line Project

Dear Mr. Driessen:

We have reviewed the Draft EIS on the Kangley-Echo Lake Transmission Line Project, also known as the Raging Cedar Powerline, due to its impact on those two river valleys. As proposed, the Sierra Club is opposed to this project.

BPA lines have huge impacts on forests and related wildlife including loss and fragmentation of habitat. Impacts of construction and operation will adversely affect water quality for a municipal water supply, affect compliance with the ESA, and diminish efforts to recover salmon and other listed species. Moreover, BPA would clearcut a swath through the watershed forest that we just succeeded in protecting.

The EIS is deficient for several reasons: an inadequate demonstration of need, failure to analyze a full range of alternatives, failure to acknowledge the seriousness of impacts, incomplete information, failure to provide adequate mitigation, and avoiding the true costs of alternatives. We ask that you correct these deficiencies and publish a supplemental Draft EIS.

Proposal

This is a substantial project, constructing nine miles of new 500kV line with towers 135' high. BPA proposes to clear vegetation from 160-300 acres and construct at least a mile and a half of new road. Also proposed are three staging areas of undetermined size and location, plus a three acre expansion of an existing substation. The cost is estimated at \$11.5 million plus \$6.5 million for substation addition (S-3).

Need

Purpose and Need Unsubstantiated

The need for this project has not been demonstrated, and the "purpose and need" statement in the DEIS is not clearly defined. The EIS merely claims that this project is needed to maintain system reliability and describes recent weather and general electrical grid situation and efforts at conservation. However, there is no substantive information that demonstrates that this project is necessary, nor that a more aggressive conservation effort would be a viable alternative.

There is no explanation of the electrical transmission system serving the King County area that supports the necessity of the proposed line. The DEIS should include a regional system analysis that shows the current situation and other improvements BPA is

considering in the near term and distant future so the reviewer can understand why this specific link is necessary. Furthermore, it should demonstrate why BPA feels this project must be done in a particular manner and time frame that appears to preclude all but the selected alternative.

Impacts

Contrary to BPA's description, this project has serious and extensive impacts. We are very concerned that BPA's approach to these impacts is weak and fails to fully understand them or fully mitigate for them. Such a project should not be constructed without such mitigation. Since full mitigation is not considered in the cost estimates, it is unclear whether alternatives rejected for cost would be less expensive.

Serious cumulative impacts ignored

BPA claims, "...the relatively small areas required for the proposed transmission facilities would have only a low impact." (DEIS 4-6). This disregard for the impacts to precious resources, such as late-successional forest, clean drinking water, and cultural resources as well as the cumulative impacts of transmission lines crisscrossing the forests of this region, is indicative of BPA's lack of understanding of the impact of this proposal. The cumulative effects analysis is extremely weak, with no data to justify conclusions. The EIS merely states that the cumulative impacts of forest loss is considered low (DEIS 4-53). On the contrary, the cumulative effects of this and other BPA lines is significant, and when combined with other loss of forest becomes quite significant. This disregard for the cumulative effects of BPA's actions is a serious deficiency of this EIS.

The DEIS must describe the impacts of existing line, as well as the combined effect of two lines. We understand that BPA is currently considering a similar project from Echo Lake to Monroe. This and other proposals must be described and the cumulative effects evaluated.

1.5 miles of new road construction has significant adverse impacts. Roads have high impact to soils, water quality, fragmentation of habitat, and wildlife behavior. BPA's proposal that 50' wide easement outside of powerline ROW seems excessive. While for planning purposes that might be appropriate, the road construction should be much narrower and specified within the narrowest easement. A 16' road surface plus 4-6' near curves is also excessive (DEIS p2-7). A single land road should suffice for equipment. Helicopters should be used if cranes cannot negotiate single lane roads with curves. Ten feet on either side of the road for ditches is also excessive. This 36' wide impact is not consistent with the 20' wide disturbance width used for the DEIS analysis (DEIS p2-7).

Protecting Important Resources

The Cedar River watershed encompasses a unique lowland forest that will be protected in perpetuity, thanks to the City of Seattle's vision and commitment. Surrounding remnants of the original forest, the second growth has been growing and developing for up to 100 years. Nowhere else in the county will we see such ancient forests- at low elevation, in large blocks. This is also a critical ecological connection to Tiger Mtn. and Rattlesnake Ridge.

While lands in the Raging River may be managed for timber, it will provide age classes of over 40 years, while in the powerline right of way trees will never exceed a few years. Due to conservation easements being developed in the valley, it should not be converted to urban uses. This and its location makes this valley particularly significant for forest ecosystem conservation. Thus, BPA should mitigate for the difference in this type of forest, by acquiring and conserving for forestry an equivalent amount of land that would otherwise be converted to non-forest uses.

The impact of the BPA line will be in perpetuity, therefore the mitigation must be in perpetuity. The only reasonable solution is BPA must replace the lost habitat, sometimes referred to as compensatory mitigation.

There are several excellent candidates in the vicinity of the line, including sections near Selleck, Taylor Mtn., the upper Rock Creek valley and Green River.

The DEIS states several times that the clearing would be 150' wide, but table 2.1 (DEIS p2-6) says 374'. If no extra clearing is done between towers (that is 75', assuming as close as possible), then 187' would be cut on the other side; thus, total clearing is 262' wide. Additional "danger trees" could be felled (p S-3). This could increase to up to 476' slope distance through mature and old-growth forests. At only 150' wide, 9 miles of clearing equals more than 160 acres, but it is apparent that clearing could easily exceed 300 acres, much of it late-successional forest. This is a significant impact on forest, which only increases if we assume blowdown in adjacent forest due to this clearing. In addition, there would be 3 acres of clearing for substation expansion. BPA is considering reduced clearing within the Cedar River watershed, but provides no specifics. This is crucial information and should be in a supplemental Draft EIS, rather than in the Final EIS.

Impacts on Wetlands

Ten wetlands with 242 acres are located within 500' study corridor (DEIS p3-47). While not all may be directly impacted by clearing and construction, all will be seriously affected. Mitigation measures should address all these. The first approach is avoidance. If an area can't be avoided, then replacement areas must be acquired and protected.

Important fisheries in Raging & Cedar Rivers

The City of Seattle is working to re-establish salmon in Cedar River. The Raging River has coho and Chinook salmon. Additional road construction, clearing, and potential spills all will adversely affect these species.

Impact on behavior of wildlife

Marbled murrelets may be using the upper watershed. This species tends to fly along the river corridors. Thus, any towers or lines that cross the rivers would present a hazard from both collision and electrocution. This is a significant impact, and one that bears on BPA's obligations under the ESA. As the forest approaches late-successional character, spotted owls will increase their use in this area. BPA's line will eliminate potential habitat and make it more difficult for owls to reach habitat to the west. Again, BPA's action may not be consistent with the ESA.

Fragmentation of habitat is a major concern, and one not adequately treated in the DEIS. This creates barriers to wildlife movements due to inappropriate habitat conditions and/or increased predator success. In some cases makes good habitat unusable. It is imperative that the upper and lower Cedar River forests be connected by the best possible habitat. Similarly, the connection to Tiger Mtn. and other forests in the vicinity is needed. BPA's powerlines are one of the most significant obstacles to achieving those goals.

Corridor management needs revision

The management of other vegetation in the ROW corridor (DEIS p2-5) is excessive and needs to be revised. Less clearing and more allowance for shrubby and woody vegetation should be included. This may require more frequent attention, to allow maximum height of vegetation, while maintaining safety clearances. Wherever topography is favorable, taller trees should be allowed to grow. In certain areas, this could be combined with installing taller towers, (thus increasing line height), to provide considerable forest cover.

Seattle City Light's management within the Ross Lake NRA has begun to incorporate some of these approaches. In special areas, such as the Cedar River watershed, special actions are necessary. While this might require more frequent corridor management, that is part of the price for traversing these special areas.

The new clearing and construction will allow incursions of noxious weeds. The current ROW has weeds, so the regional plan referenced in the DEIS is not adequate to control them. Additional clearing will engender additional weeds. A commitment to a control plan with proven effectiveness, even if it is all manual, must be a part of any powerline corridor.

We are pleased with your commitment to not use any herbicides in the Cedar River Watershed. (p S-5). However, it appears that it will be used in the Raging River watershed. The salmon in this river need the highest quality water and the powerline cross the river and continues for several miles in the watershed.

Alternatives

Range of alternatives is inadequate

The alternatives did not represent a full range, as numerous possibilities were rejected without further study. NEPA requires that reasonable alternatives be considered which include those alternatives that can meet the objectives, as defined by the purpose and need statement, of the proposal. For the stated goal, there is a much larger range of reasonable alternatives.

The DEIS does not provide sufficient analysis of alternatives outside of the Cedar River Watershed to support their elimination without detailed evaluation. The DEIS notes impacts to "developed land and people living in the area." While it is clear there would be impacts, there is no analysis of the type, amount or significance. BPA cannot simply dismiss an alternative just because it would have impacts. All of the alternatives through the watershed also have impacts, and yet they were not dropped from consideration. Lacking stated criteria and evaluation, there is no justification for dropping certain alternatives and narrowly limiting the range of alternatives considered in the DEIS.

The EIS must evaluate the full range of reasonable alternatives. The DEIS also needs to present a detailed cost justification for the proposed action to ensure that agency funds are being spent prudently. This should include full consideration of anticipated future projects, as well as considering mitigation measures that could avoid or reduce impacts of the proposed action. Furthermore, NEPA requires that federal agencies consider alternatives that can accomplish the objectives of the proposal, but at a lower environmental cost.

Alternatives not considered

Adding a circuit to the existing towers, or replacement towers should still be considered. The risk of loss of a tower is very low, especially given the limited access, so the risk of losing two circuits at the same time is low. At your public meeting, a BPA staff person said it would require a six months outage to replace the existing towers and line with a double circuit. What length of time can you have this line out of service? Did you analyze using existing towers within the Cedar River Watershed, and separate towers outside? With accelerated construction activities and careful scheduling could the outage period be reduced to levels that would not significantly affect system loads? Again, there was no information in the DEIS on these questions.

Alternatives of rebuilding other lines and adding equipment at substations to increase voltage were briefly mentioned and dismissed (p2-18). Information on these options should have been expanded and compared to the proposed action.

We agree that no additional powerlines from Stampede Pass to Echo Lake should be built, but rebuilding an existing line was dismissed with little discussion except the cost would be higher. There is no assessment of whether BPA would in the future propose an additional circuit or increase of voltage on this line. Would rebuilding a 500kV double circuit now be more cost effective in the long run? Will BPA want to build another powerline in the Echo Lake-Raver corridor? If so, why doesn't the agency

consider using towers that carry two circuits, so we don't have to go through the same discussion again in a decade or two.

We have similar questions about the Covington-Maple valley 30kV line. There is no backup information to the claim that that circuit could not be taken out of service for reconstruction or that vacant circuits could not be used as part of this alternative. (p 2-17)

Routes outside the watershed were rejected, but will these be necessary in the future anyway? The impacts were vaguely described, but at least one of these should have been included in the EIS. All the impacts of such lines should be analyzed and compared to the proposed action.

We are adamantly opposed to other routes through the Cedar River watershed (alt 2, 4a, 4b) as they also have impacts associated with the preferred alternative plus additional destruction and fragmentation of forests and other natural habitats.

Conservation should be first choice

We are concerned with the lack of consideration of energy conservation. With reduced demand, such lines would not be necessary. The DEIS did not adequately consider alternatives of energy conservation, merely stating that BPA was doing all it could. We do not agree. While most of our comments in this letter focus on the project, we have not been convinced that conservation would not obviate the need for this project.

Environmental Analysis

Inadequate information and analysis

The DEIS has inadequate information and incomplete analysis for a reasoned decision. It violates NEPA by failing to fully disclose all environmental impacts. Clearly, a supplemental DEIS is needed.

For instance, the DEIS says that three staging areas will be needed (S-4). How large will these be? Where will they be located? What restoration measures will be implemented once they are no longer needed? This is key information lacking in the DEIS.

The fisheries analysis in the DEIS and technical appendix is inadequate due to lack of assessment of Type 4 and 5 streams, lack of thorough erosion assessment, minimal site-specific information on streams, no quantification of impacts by stream crossing, and lack of disclosure as to the extent of clearing in riparian areas. These omissions effectively preclude an evaluation of project effects.

The DEIS seems to avoid the fact that the Cedar Watershed is an unfiltered source of high quality water for over a million people in the Puget Sound region. The DEIS says nothing about potential impacts to the drinking water supply for these people. Incidents such as toxic spills or turbidity plumes are serious risks in any watershed, but are totally unacceptable in this watershed. What specific measures will be implemented to eliminate this risk? In addition, public notices and public meetings related to the NEPA scoping and DEIS comment periods have not been effective in involving those that drink this water. Additional public involvement with a Supplemental Draft EIS should be done.

Many of the impacts noted in the DEIS meet CEQ's definition of "significant." However, the DEIS avoids this determination, using instead the relative terms, "low, medium, and high." Thus, BPA has not taken a "hard look" at the impacts, as required by CEQ. Consequently, the public, other agencies, as well as BPA decision-makers do not have adequate information to review. Because of the importance of "significant impacts" in the NEPA process, failure to disclose this information is as serious breach of NEPA itself.

Several key aspects of the proposed transmission line are not described in sufficient detail to support an evaluation of impacts. We understand that BPA completed a Final Biological Assessment for this project during the public comment period for the DEIS. This indicates that sufficient details were available for the DEIS. The fact that specific, known design information for the proposed action was omitted from the DEIS indicates BPA has violated NEPA by failing to fully disclose environmental impacts. Please provide us with a copy of the biological assessment, and include it in a supplemental DEIS.

Failure to adequately describe the project compounds the vagueness of proposed mitigation measures, making it impossible to evaluate the effectiveness of mitigation. The net result is a level of uncertainty of the proposal's impacts that renders the DEIS useless to reviewers and decision-makers.

The impacts of the project are potentially greatest for the Cedar River Watershed, especially considering the area is the region's major drinking water supply, and the land is being managed under a complex Habitat Conservation Plan (HCP). However, BPA's proposed actions and their impacts are described so minimally that it is not possible for the public to evaluate the project's impacts. Once again, the DEIS does not fully disclose environmental impacts.

Site specific information on clearing requirements in the watershed (p2-6) and access roads (p2-7) is lacking, although at one point the DEIS describes removal of trees on the Cedar River as a "high" impact (p4-36). BPA attempts to avoid the requirement with an explanation that the information will be available for the Final EIS. This information is critical to evaluating project impacts and mitigation measures and therefore should be provided as part of the DEIS. Also, the DEIS does not describe tower locations, which could have substantial impacts. This does not provide the public with adequate opportunity to review the proposal. Again, a supplemental DEIS is needed.

Lack of consistency with federal, state, and local regulations

NEPA regulations require that an EIS discuss how the proposed action is consistent with federal, state, and local land use plans and policies. Has this been done, and if so how has BPA reconcile any conflicts. Two examples in the subject project are King County's sensitive areas and Shoreline Management provisions.

We cannot find where BPA coordinated with federal agencies on Endangered Species Act prior to releasing the DEIS. Perhaps this is one reason that the DEIS fails to fully assess impacts on endangered and threatened species such as Chinook salmon and coho salmon, and fails to address impacts on marbled murrelets. BPA has an obligation under the Endangered Species Act and Northwest Power Act to protect, mitigate, and enhance salmon runs where affected by its actions. However, BPA's proposed action has adverse impacts on federally listed salmon and their habitats that are not adequately mitigated.

This project will directly affect the Cedar River Habitat Conservation Plan, under the Endangered Species Act. BPA indicates that USFWS will have to "decide if the transmission line facilities require any change to the existing Habitat Conservation Plan...." The DEIS does not discuss the proposed action's impacts on the HCP, but the DEIS fisheries technical report suggests construction of the proposed action would violate provisions of the HCP. Commitments made by the City in its HCP would be substantially diminished by the BPA project, reducing the conservation value of the plan. The City should not need to modify the HCP as a consequence of BPA's activities. If BPA requests such changes, it must provide mitigation for any impacts that reduce the conservation value of the City's HCP that, at a minimum, compensates for that reduction in value.

Mitigation

The DEIS lacks mitigation for unavoidable impacts.

The DEIS suggests "mitigation measures", but these are actually standard practices (sometimes called best management practices or BMPs) and not really project mitigation measures. They do not offset, reverse, or rectify the impacts of constructing the proposed project. Thus, BPA's suggestion that "maintaining environmental quality" (S-2) is one of the purposes in developing this project, is but an empty statement. For example, although the DEIS states that impacts on ESA-listed species of fish are "high," BPA fails to commit to any mitigation that would offset those impacts.

We understand that BPA has not mitigated for habitat losses of their powerlines in the past. But this must change. Unless and until BPA makes a binding commitment to replace lost, damaged and fragmented habitat, we must oppose construction of this line.

BPA cannot externalize the costs of this project, as it has done with previous lines. The loss of the forest is more than just a loss of timber revenue. It is a permanent loss of habitat that is rapidly disappearing—especially in the foothills of the Cascades in King County. The cost of such replacement must be included in the cost, then compared to other alternatives. The sale of timber by the underlying landowner does not mitigate the long term impacts of logging. Past practice of ignoring the loss of forest permanently is no longer defensible.

The mitigation measures presented in the EIS are wholly inadequate for a project of this nature. All construction alternatives should include the following.

- BPA should replace all habitat damaged within the project area with equivalent habitat type and quality in the vicinity, or if unavailable, then increase acreage in ratio to lesser quality, plus a premium for fragmentation.
- The height of transmission lines at Cedar and Raging River crossings should be high enough to allow late successional forest to grow to 200' tall in the riparian zone of the river and to mature heights on the slopes above the river bottom. Given the topography on either side of the river, that should be feasible. BPA should increase the height of the towers in that vicinity if necessary. We are disappointed that this issue was not addressed in the DEIS. We had brought it up during scoping and public meetings at that time.
- Eliminate roads outside of cleared powerline right of way. Use helicopter and/or trails to access those sites. Any roads constructed should be offset by eliminating an equal or greater amount of road in the affected watersheds, over and above what is planned by the land owner.
- Minimize tree cutting outside of 150' corridor; first option should be to only top them, then, if necessary, removing those trees deemed likely to topple into the lines within a short period of time, rather than wholesale clearcutting.
- Apply measures to prevent any and all toxic materials and sediment from entering surface or subsurface waters in the Cedar River Watershed.

Conclusion

The Draft EIS is inadequate, and should be redone to display a full range of alternatives, demonstrate need, include relevant information, adequately assess the impacts and incorporate adequate mitigation, describe required coordination with other governmental entities, and incorporate and describe all costs of the project. The project fails to meet the requirements of NEPA and the ESA. We urge BPA to withdraw its proposal and only reissue a Draft EIS when has a proposed action that is legally and environmentally acceptable.

Thank you for this opportunity to comment on the DEIS. Please keep us apprised of any actions related to this proposal.

Sincerely,

Charles C. Raines
Director, Cascade Checkerboard Project

cc: Senator Patty Murray
Senator Maria Cantwell
King County Executive Ron Sims
Mayor Paul Schell

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <u>KELT-383</u>
RECEIPT DATE: SEP 04 2001

5027 19TH AVE NE
SEATTLE, WA 98105
AUGUST 29, 2001

Communications
attn: Mr. Lou Driessen, Project Manager
Bonneville Power Administration - KC-7
PO BOX 12999
Portland, Oregon 97212

Dear Mr. Driessen,

I am writing with regard to the Bonneville Power Administration's interest in building new powerlines in the Cedar and Raging River watersheds.

I appreciate the importance of providing electricity to customers and I admire BPA's ability to do so at a low cost. I am concerned however with BPA's proposal to install nine miles of 500 kilovolt lines with a necessity of clearing away between one hundred fifty to two hundred eighty five feet worth of trees. I am also concerned about the plans BPA has to build one and a half miles of new roads in order to accomplish this task.

Mr. Driessen, I am sure that you care about the ecosystem and that you love the outdoors as much as the next person. I gather that you comprehend the importance of low elevation forests, rapid loss of forests in King County, and Seattle's decision to preserve its watershed forests.

Sir, I am against building new 500 kilovolt

Mr Lou Driessen

August 29, 2000

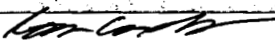
page two

lines through the watersheds and I am opposed to construction of any roads in them. One of the reasons for my position sir, has to do with salmon fisheries in Raging River as well as Seattle's attempts to reestablish salmon in Cedar River.

Mr. Driessen, I do however support BPA adding additional circuits to towers in the existing corridor, if safe and if it can be done for a reasonable cost and without threat to BPA's workers.

Furthermore, I believe it to be of the utmost importance that any and all forests and wetlands that have been damaged by BPA be repaired through replacement. I also respectfully request a new Environmental Impact Statement with nothing less than all needed information, a substantive cumulative effects analysis as well as additional alternatives.

This letter states my position Mr. Driessen. I know BPA has a lot of pressure to produce but I think it can get the job done without harming our beautiful watersheds.


TOM HUNDLEY
tom@principia.edu

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <u>KELT-384</u>
RECEIPT DATE: SEP 04 2001

4244 NE 88th Street
Seattle, WA 98115
August 31, 2001

Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

This is to ask that the Bonneville Power Administration **build any new power lines through the Cedar and Raging River watersheds on already existing towers.**

The current plan--to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road--would have severe, extensive impacts throughout both watersheds. Wetlands, salmon grounds and fisheries, and forest habitat--all of which are at risk -- would be impacted by such a plan.

From my work in wetlands, I've found that mitigation does not recreate damaged or destroyed wetlands or forest. It may on paper, but the reality in every case is that the ecosystem never again works as it did before. This is true even for relatively small projects such as the BPA's proposed new 500 kilovolt line. A new Environmental Impact Statement (DEIS) is needed, with information and analysis of cumulative effects along with additional alternatives for the proposal to build within the Cedar River watershed.

I think it's vitally important to respect the sanctity of a protected watershed.

Sincerely,



Lynn Pruzan

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-385 RECEIPT DATE:
--

Dear BPA Project Manager,

PLEASE ENTER THIS LETTER INTO THE
PUBLIC RECORD WITH REGARDS TO
THE DEIS FOR THE KANGLEY-ECHO
LAKE TRANSMISSION LINE PROJECT.

I'D LIKE TO ADD MY VOICE
TO THOSE WHO ARE CALLING FOR
THE FOLLOWING.

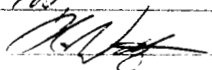
- ① ANY NEW LINES SHOULD BE
PLACED ON EXISTING TOWERS.
- ② IN ANY ALTERNATIVE, THE
BPA MUST FULLY MITIGATE FOR
ANY IMPACTS OF ITS PROJECTS.

ie- REPLACE ANY FORESTS YOU CUT
OR WETLANDS YOU DESTROY

- ③ A NEW EIS SHOULD BE DEVELOPED
THAT FULLY CONSIDERS THE CUMULATIVE
EFFECTS OF THIS PROJECT & ALL ALTERNATIVES.

ROBERT WATIER
2624 NE 145 AV.
VANCOUVER, WA 98002

THANK YOU



RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <u>KELT-386</u>
RECEIPT DATE: <u>SEP 04 2001</u>

6215 Ravenna Avenue NE
Seattle, WA 98115-7025
August 31, 2001

Lou Driessen, Project Manager
Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

**Please, build any new power lines through the Cedar and Raging River
watersheds on already existing towers.**

Also, please offer a new Environmental Impact Statement that supplies a substantive cumulative effects analysis of the proposal to build in the Cedar River Watershed, along with additional alternatives. The current plan--to clearcut a swath of forest (currently protected from logging) within the watershed and to construct new road--would have severe, extensive impacts throughout both the Raging River and the Cedar River watersheds. Wetlands, salmon grounds and fisheries, and forest habitat--all of which are at risk --would be impacted by such a plan.

Sincerely,



Ceci Cordova

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <u>KELT-387</u>
RECEIPT DATE: <u>SEP 04 2001</u>

4250 NE 88th Street
Seattle, WA 98115
1 September 2001

To the attention of: Lou Driessen, Project Manager
C/o Communications
Bonneville Power Administration - KC -7
Post Office Box 12999
Portland, OR 97212

Dear Project Manager:

**Please, build any new power lines through the Cedar and
Raging River watersheds on already existing towers.**

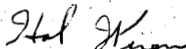
Also, please offer a new Environmental Impact Statement that
supplies a substantive cumulative effects analysis of the proposal to build
in the Cedar River Watershed, along with additional alternatives. The
current plan--to clearcut a swath of forest (currently protected from
logging) within the watershed and to construct new road--would have
severe, extensive impacts throughout both the Raging River and the Cedar
River watersheds. Wetlands, salmon grounds and fisheries, and forest
habitat--all of which are at risk --would be impacted by such a plan.

Sincerely,



ALICE WIREN

and



HAL WIREN

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <u>KELT-388</u>
RECEIPT DATE: SEP 04 2001

Aug. 29, 2001

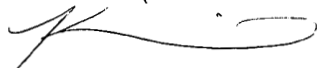
Dear Lou Drivesson,

We, the residents of Seattle, WORKED HARD TO HAVE THE Cedar River AND THE Raging River watersheds PROTECTED FROM TREE CUTTING AND FROM ROAD BUILDING AND TO HAVE PAST DAMAGE RESTORED SO WE CAN BE ASSURED OF A SAFE WATER SUPPLY

YOU ALREADY HAVE A RIGHT OF WAY THROUGH THESE WATERSHEDS THAT YOU CAN USE FOR YOUR EXPANSION OR YOU CAN USE ALTERNATE ROUTES OUTSIDE OF THE WATERSHEDS.

I STRONGLY OPPOSE THE PROPOSED POWERLINE THAT WILL FURTHER DESTROY OUR WATERSHEDS; ON WHICH THERE HAS BEEN NO OFFER OF REPLACEMENT FOREST AND WETLANDS; AND FOR WHICH IMPACT ANALYSIS AND ALTERNATIVES HAVE NOT BEEN PREPARED.

Sincerely



TABITHA KIESEL
109 NW 76
Seattle WA 98117

Telephone comment by Ginny Kuehn
9/4/01

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-389
RECEIPT DATE: SEP 04 2001

Doug Lawrenson
3232 Conkling Place W.
Seattle, WA 98119
(206) 283-4350

I object strongly to the idea that this power line would go through Seattle's watershed, which has just gone through extensive public process to keep the city river watershed undisturbed and clean. The idea that old growth forests and the watershed maybe cut down for this power line is absolutely appalling and I am hoping that when you come up with the final scope of the EIS that it will include routes that avoid construction and maintenance in Seattle's watershed, not just Seattle's watershed. Seattle supplies water too much of the regions from this watershed. So I am absolutely adamant that you need to find routes that go outside the watershed and that don't cut down old growth forests.

Thank you.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 4:39 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Cedar River Watershed

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: KELT-391
RECEIPT DATE: SEP 05 2001

-----Original Message-----

From: James T Michel [mailto:micheljt@hotmail.com]
Sent: Tuesday, September 04, 2001 3:34 PM
To: lcdriessen@bpa.gov
Subject: Cedar River Watershed

Lou,

It has come to my attention that the BPA is considering cutting a new 9 mile swath of the cedar river watershed to run new power lines. I am very opposed to this proposal. Currently, lines already exist, and running additional lines along the already existing corridor would be considerably less invasive than removing trees from one very important watershed to further scar this unique wildlife habitat.

Please do not Cut any more in the Cedar River Watershed.

Best Regards,

James T. Michel
3018 26th Ave W
Seattle, WA 98199

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 5:17 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Biodiversity Project, Kangley - echo lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: <i>KELT-392</i>
RECEIPT DATE: SEP 05 2001

-----Original Message-----

From: Jill McGrath [mailto:cbcnews@cascade.org]
Sent: Tuesday, September 04, 2001 4:58 PM
To: lcdriessen@bpa.gov; coment@bpa.gov
Subject: Biodiversity Project

To Lou Driessen, Project Manager:

Greetings,

I am writing to ask that the BPA not put any new lines on the existing towers. I understand that the BPA wants to build 9 miles of new 500 kilovolt line through the Cedar and Raging River watersheds. This would include 1.5 miles of new road construction. This plan would destroy forests recently protected by the City of Seattle.

Cutting of trees could be as far as 200' from the powerline, especially if it is old growth forest...not the 75' as is implied in the summary.

Would BPA build a powerline through Mt. Rainier National Park? Then why does it propose to through our watersheds?

I support adding additional circuits to towers in the existing corridor; I support having a new EIS with needed information on any decision.

In any alternative chosen, BPA must fully mitigate the impacts of the projects. That means replacing any forests that are cut.

Sincerely,

Jill McGrath
6743 Palatine Ave N
Seattle, WA 98103

Kuehn, Ginny -KC-7

PUBLIC INVOLVEMENT

From: Driessen, Laurens C - TNP-3
Sent: Tuesday, September 04, 2001 5:18 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Raging Cedar (Kangley-Echo Lake Transmission) Line

LOG#: KELT-353
RECEIPT DATE: SEP 05 2001

-----Original Message-----

From: Donald Potter [mailto:potter.d@ghc.org]
Sent: Tuesday, September 04, 2001 4:18 PM
To: lcdriessen@bpa.gov
Subject: Raging Cedar (Kangley-Echo Lake Transmission) Line

Dear Mr. Driessen,

I have been aware of the proposed Raging Cedar Powerline proposal for several months now, and am distressed that it would cause a number of environmental problems.

First, it destroys forests, including Seattle's watershed, which is now protected from logging. The loss of a forest is more than just a loss of timber revenue, but is a permanent loss of habitat, which is rapidly becoming scarce in this highly populated portion of the state.

Second, no mitigation of replaced forests is included in the proposal, and should be.

Third, the area encompasses a unique lowland forest, including old growth forest. Such projects fragment the forest and connectivity so vital for the survival and migration of species, both flora and fauna.

Please, do the following:

- add additional circuits to towers in the existing corridor
- replace any forests or wetlands that are damaged
- complete a new EIS with substantive cumulative effects analysis and additional alternatives, including conservation.

Thank you

Respectfully yours,

Donald E. Potter, MD
3823 140 th Ave NE
Bellevue, WA 98005-1473
e-mail: potter.d@ghc.org

Kuehn, Ginny -KC-7

From: Edvondrasek@aol.com
Sent: Wednesday, September 05, 2001 6:30 PM
To: lcdriessen@bpa.gov
Cc: comment@bpa.gov
Subject: (no subject)

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-396</i>
RECEIPT DATE: SEP 06 2001

Dear Sir,
2001

September 4,

I am writing to voice my strong opposition to your proposed Raging Cedar Powerline Project.

I worked hard with the Pacific Crest Biodiversity Project (where I serve on the Board of Directors) and the Protect Our Watershed Alliance to move the City of Seattle to protect the watershed and the forests and fisheries it holds, and to create the HCP to which the City is accountable. This proposed powerline would violate the HCP, which disallows any logging of the type required by this project in our watershed. This project should not even be considered in this protected area. No logging is legal in our watershed and the goals of the HCP are to remove roads not to cut new ones.

I demand that BPA drop this proposal immediately and consider legal (and ecologically sound) alternatives, such as adding additional circuits to towers in existing corridors. I request a new EIS with information including a substantive cumulative analysis and the addition of conservation alternatives.

Please keep me informed about the proposed project. Thank you.

Sincerely,
Chris Vondrasek
4742 35th Avenue S.
Seattle, WA 98118
email: bp649@scn.org

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Monday, September 10, 2001 7:52 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Mr. Dreissen's reply, Kangley - Echo Lake

RECEIVED BY bpa
PUBLIC INVOLVEMENT
LOG#: KELT-397
RECEIPT DATE:
SEP 10 2001

-----Original Message-----

From: Judy Lightfoot [mailto:jhlightfoot@hotmail.com]
Sent: Friday, September 07, 2001 12:04 PM
To: comment@bpa.gov; lcdriessen@bpa.gov
Subject: Mr. Dreissen's reply

Dear Mr. Dreissen,
Either you are being disingenuous for PR purposes or you didn't read my message carefully. I did not ask that the same lines or circuits be used for additional power. Another possible option is to put up new towers in the same clearcut swaths, if necessary slightly widened, instead of clearcutting new swaths in different areas. Please be careful to understand public comments on this important issue.
Thanks,
Judy Lightfoot

>
>Date: Mon, 3 Sep 2001 21:15:34 -0700
>From: "Driessen, Laurens C - TNP-3" <lcdriessen@bpa.gov>
>Subject: RE: Bonneville Power clearcuts
>
> [The following text is in the "iso-8859-1" character set.]
> [Your display is set for the "US-ASCII" character set.]
> [Some characters may be displayed incorrectly.]
>
>Thank you for your comments. We will include them along with those from
>others to determine the selection of the final plan/alternative and
>mitigation measures. We are also concerned about the impacts to the
>natural
>environment and are looking at ways to mitigate as indicated in the
>Draft
>EIS. Concerning your suggestion of putting the new line together with
>the
>existing line, we cannot do that for reliability reasons, also
>described in
>the DEIS. It would be to big of a disaster to our electrical system to

>have
>both lines go out at the same time as is more likely in a double
>circuit
>situation.
>
> Lou
>
>-----Original Message-----

>Dear Mr. Dreissen:
>
>I am deeply concerned about the clearcut that the Bonneville Power
>Administration proposes to make within the Cedar River Watershed.
>Instead, why not improve the existing corridor? Bonneville could add
>additional circuits to the towers in the present corridor instead of
>clearcutting for a new corridor. In any case, an Environmental Impact
>Statement that includes conservation options is absolutely essential.
>
>Sincerely,
>
> Doug Schuler and Terry Frankel
> Seattle
>Judy Lightfoot, PhD
>1326 NE 62nd St
>Seattle, WA 98115
>206/522-2269
>http://www.homestead.com/judy_lightfoot

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <u>KELT-399</u> RECEIPT DATE: SEP 10 2001
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6528 - 50TH AVENUE NE
SEATTLE, WA 98115
SEPTEMBER 1, 2001

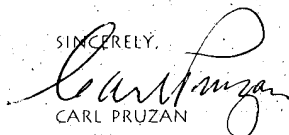
LOU DRIESSEN, PROJECT MANAGER
COMMUNICATIONS
BONNEVILLE POWER ADMINISTRATION - KC-7
POST OFFICE BOX 12999
PORTLAND, OR 97212

DEAR PROJECT MANAGER:

PLEASE, BUILD ANY NEW POWER LINES THROUGH THE CEDAR AND
RAGING RIVER WATERSHEDS ON ALREADY EXISTING TOWERS.

ALSO, PLEASE OFFER A NEW ENVIRONMENTAL IMPACT STATEMENT THAT
SUPPLIES A SUBSTANTIVE CUMULATIVE EFFECTS ANALYSIS OF THE PROPOSAL TO
BUILD IN THE CEDAR RIVER WATERSHED, ALONG WITH ADDITIONAL
ALTERNATIVES. THE CURRENT PLAN--TO CLEARCUT A SWATH OF FOREST
(CURRENTLY PROTECTED FROM LOGGING) WITHIN THE WATERSHED AND TO
CONSTRUCT NEW ROAD--WOULD HAVE SEVERE, EXTENSIVE IMPACTS
THROUGHOUT BOTH THE RAGING RIVER AND THE CEDAR RIVER WATERSHEDS.
WETLANDS, SALMON GROUNDS AND FISHERIES, AND FOREST HABITAT--ALL OF
WHICH ARE AT RISK--WOULD BE IMPACTED BY SUCH A PLAN.

SINCERELY,


CARL PRUZAN


MARIAN PRUZAN



Pacific Crest Biodiversity Project
4649 Sunnyside Ave N #321
Seattle, WA 98103

Ph: (206)545-3734
Fax: (206)545-4498
Email: pcbpinfo@pcbp.org
Web: www.pcbp.org

Lou Driessen, Project Manager
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <u>KELT-400</u> RECEIPT DATE: SEP 10 2001
--

August 30, 2001

RE: Kangley - Echo Lake Transmission Project

Dear Mr. Driessen:

The Pacific Crest Biodiversity Project, a nonprofit organization with approximately 2,000 members, is dedicated to the protection and restoration of forest ecosystems in the Pacific Northwest. We played a key role in facilitating public involvement in the development of the Cedar River Habitat Conservation Plan and advocated an end to the commercial timber sale program within the watershed.

Just over two years ago, in a unanimous and historic vote, the Seattle City Council voted to end commercial logging in the Cedar River Watershed. The vote was a conclusion to a remarkable public process in which more than a thousand people turned out to hearings and hundreds submitted comments. When the process began, the city was not planning to consider an alternative with no commercial logging. In the end, overwhelming public support for making 100% of the watershed an ecological reserve and a willingness of customers to pay an additional \$4 per average household per year led to the about-face. The city also expanded its goals for road decommissioning based on public input.

Especially within this context, proposals to cut trees or build roads in the watershed for anything but water quality or ecological integrity must be taken very seriously. It's as if the agency were proposing to cut a swath through an important park or wildlife refuge. We don't see how such a project could be consistent with Seattle's HCP for the watershed and are disappointed not to see a thorough discussion of this issue in the Draft EIS. We feel that the public should have the opportunity to see what the National Marine Fisheries Service and US Fish and Wildlife have to say about conflicts or consistency with the HCP before the project reaches the Final EIS stage.

About conservation: this was given minimal treatment in the DEIS. We do not feel BPA have given the public adequate information about the potential for conservation to

obviate the need for this project. When the call went out from local government agencies to conserve energy during the acute phase of the power crunch, the response was swift and significant. How much would the region need to conserve to avoid the brownouts you project within a few years? In a supplemental EIS, please thoroughly evaluate a conservation option and allow the public to determine whether the targets are attainable.

We also do not feel it was appropriate for BPA to reject from further consideration the option of using the existing towers for the new lines. If you can deliver the power you believe is needed without clearing more forest or building more roads, please thoroughly analyze this alternative in supplemental EIS.

We feel that any option that clears forest or builds roads in the Cedar River Watershed is a nonstarter. That said, the analysis for any alternative that does contemplate destroying habitat must include mitigation measures and must factor in the associated costs. In our view, appropriate mitigation requires that any forest cleared be replaced in kind and that any new road miles be accompanied by the decommissioning of an equal number of road miles within the same watershed. To account for fragmentation caused by a newly cleared swath, additional replacement forest will likely be required for adequate mitigation.

Please issue an additional EIS that thoroughly analyzes the potential for conservation, alternatives prematurely rejected, and the relationship of the project to Seattle's HCP. We urge Bonneville Power Administration to present a preferred alternative which requires no clearcutting or roadbuilding within the Cedar River Watershed. To do otherwise flies in the face of the will of Seattle-area citizens and the historic, fifty-year plan enacted just two years ago.

Sincerely,

A handwritten signature in dark ink, appearing to read "David Atcheson", written over a horizontal line.

David Atcheson
Vice President

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Monday, September 10, 2001 5:05 PM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Mr. Dreissen's reply

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-401</i>
RECEIPT DATE: SEP 11 2001

-----Original Message-----

From: Judy Lightfoot [mailto:jhlighfoot@hotmail.com]
Sent: Monday, September 10, 2001 11:03 AM
To: lcdriessen@bpa.gov
Subject: RE: Mr. Dreissen's reply

Thank you for this explanation. How wide is the existing clearcut? How wide will the widened clearcut be?
Thank you for your attention and time--
Judy Lightfoot, PhD
1326 NE 62nd St
Seattle, WA 98115
206/522-2269
http://www.homestead.com/judy_lightfoot

>From: "Driessen, Laurens C - TNP-3" <lcdriessen@bpa.gov>
>To: "'Judy Lightfoot'" <jhlighfoot@hotmail.com>
>Subject: RE: Mr. Dreissen's reply
>Date: Mon, 10 Sep 2001 07:51:49 -0700
>

>The preferred plan is to parallel immediately next to the existing line >thereby reducing the amount of clearing needed as stated in the Draft EIS.

>We cannot put the new line in the existing R/W without doing any clearing.

>There is just not enough room. The only way to put the new line in the >existing clearing is to remove the existing line and replace it with towers

>that would support the existing line and the new line such that both >circuits would be on the same structure. That would be unacceptable from a

>reliability standpoint. So the preferred option is doing what you are >suggesting, utilizing the existing right of way to the extend possible and

>minimizing clearing. In addition, we normally take any tree outside of the

>right of way that could potentially fall into the new line. In this case

>through the watershed, we are planning to take only those trees that are

>unhealthy and leaning heavily towards the line and are most likely to fall

>down in a heavy wind. All healthy trees would be allowed to remain. I >think we have a preferred option that takes into account all the aspects

>and

>concerns while meeting the needs of the project and minimizing the >environmental impacts to the watershed, other natural environments and >people impacts. Hope this helps.

>

> Take care

>

> Lou

President
James J. DeLoe, Chairman
Washington Area Conservation Society-Center

Vice President
Kath Thomas, Executive Vice President
Washington County

Treasurer
Doreen J. Smith, Executive Vice President
Washington County

Secretary
T. Theodora Thompson
Hawagard Area Study Club

Executive Director
Nancy Keith
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Rain Kingdom

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Janet Thompson, Treasurer



August 31, 2001

Mr. Lou Driessen
c/o Communications, Bonneville Power Administration
P.O. Box 12999
Portland, OR 97212

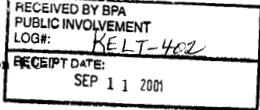
Dear Mr. Driessen,

The Mountains to Sound Greenway Trust wishes to comment on the DEIS for the proposed Kangley-Echo Lake powerline expansion.

The private non-profit Greenway Trust and a variety of county, state and federal agencies have devoted significant, combined efforts and public funds for over ten years to create a permanent, multipurpose greenway corridor straddling I-90 from Seattle to the east side of the Cascade range. Through these combined efforts, over 80,000 acres have been brought into public ownership in the corridor, with goals to protect scenic values, wildlife habitat, forested landscapes, recreational opportunities, and environmental qualities. Over \$80 million in public funding has been spent to conserve this broad landscape.

Because of these efforts, in 1999 the Greenway segment of the I-90 corridor was designated a "National Scenic Byway", the first interstate corridor in the nation so designated. This designation indicates that special consideration be given for any potential impacts to the scenic and visual character that now exists. As soon as BPA's Kangley-Echo Lake line crosses to the north face of Taylor Mountain it is within the viewshed of I-90 travelers who now enjoy a sweeping view over many miles of a forested basin. Doubling of the width of this power line corridor will negatively impact this view. Thus, we strongly suggest that BPA consider adding the additional power lines onto your existing towers, even if this requires replacing existing towers with a new design. In addition, we urge you to keep the cleared corridor width to an absolute minimum and to add a significant amount of plantings that minimizes the visual contrast between the power line corridor and the adjacent forest.

In the specific location of BPA's proposed power line expansion, the Greenway Trust and our partners have been instrumental in creating the



1011 WESTERN AVENUE
SUITE 606
SEATTLE WA 98104
PHONE (206) 382-3565
VOLUNTEER LINE (206) 812-0122
FAX (206) 382-3414
WWW.MTSGREENWAY.ORG
EMAIL: MTSGREENWAY@GMAIL.ORG

August 31, 2001
Mr. Lou Driessen

"Snoqualmie Preservation Initiative," which will permanently conserve the forests of the Raging River basin from future development and impacts. We will soon secure public purchase of the 350-acre Trillium parcel in Section 26 that BPA's power line now passes through. This entire basin, as well as Tiger Mountain to the west, the Cedar River Watershed to the south, and Rattlesnake Mountain to the east have been deliberately conserved and will be managed as permanent forestland. Proposals for expanding power line corridors through any of these forests must carefully consider and absolutely minimize potential impacts to the multiple scenic, environmental, recreational, habitat, and forest product benefits that these forests provide. Much of the lowland forests of the Puget Sound region have been fragmented or lost; it is critical to carefully protect what remains.

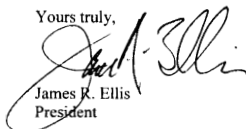
Thus, the Greenway Trust is concerned that the DEIS for the Kangley-Echo Lake power line expansion makes no mention of mitigation for the permanent loss of forestland that the project proposes. We estimate the minimum, permanent loss of forest cover to be $150' \text{ (proposed corridor width)} \times 9 \text{ miles (proposed length)} = 164 \text{ acres}$. In an era of salmon listings, new measures being taken to protect native vegetative cover and heightened sensitivity to the importance of forests for wildlife habitat, water quality and quantity, recreation, scenic values, air quality and carbon sequestration, and more, BPA should permanently replace the 164 acres of forest lost to clearing and "development" with a minimum of 164 forested acres elsewhere. Since the impacts of the proposed project are within the Greenway corridor, we believe that BPA should provide replacement forestlands within the corridor. This should be factored into the project costs and could be accomplished via a conservation easement or fee acquisition. The Trillium parcel, now held by the Trust for Public Land until public funding becomes available, offers an immediate mitigation opportunity if BPA wishes to participate in its public purchase.

Other proposals for development in this region have required compensating mitigation for loss of forestland and habitat. Most notably, King County has a "4:1 program" which requires a developer to donate 4 acres to public ownership for every one acre rezoned into a higher urban zoning status. The City of Issaquah has utilized an "Urban Village" designation to cluster proposed developments while permanently protecting 75% of each site as public forestland. The Cedar River Watershed implemented a new Habitat Conservation Plan to protect and restore its old-growth forest characteristics. These, and other programs have set a precedent that BPA should follow when planning for any new power line corridor in this region.

BPA's proposed approach to "danger trees" is another issue of concern. Cutting any tree within range of the powerline that MIGHT have a future impact is not acceptable. Just as the Cedar River Watershed is not allowing this approach across their land, BPA should take a similar approach along the entire 9-mile length, and use the "stable tree" approach everywhere. We also believe mitigation should be provided for any trees that are cut outside of the 150' proposed BPA ROW.

A great deal of effort and public investment has gone into creating the Mountains to Sound Greenway corridor and permanently protecting its scenic forested character. It should be the policy of BPA to minimize and mitigate any negative impacts its projects may bring to this corridor. Thank you for the opportunity to comment.

Yours truly,



James K. Ellis
President

Kuehn, Ginny -KC-7

From: steve dubinsky & dina winkel [stevdina@oz.net]
Sent: Tuesday, September 11, 2001 9:14 PM
To: ldriessen@bpa.gov; comment@bpa.gov
Subject: Kangley-Echo Lake transmission project

RECEIVED BY BPA

PUBLIC INVOLVEMENT

LOG#: KELT-403

RECEIPT DATE:

SEP 12 2001

To Whom It May Concern -

I strongly disapprove of the plan to install 9 miles of new transmission lines through the Cedar River and Raging River watersheds.

I am concerned about the wildlife in this untouched area, which is vulnerable and can't fight back. We should know better than to intrude further into their habitat.

I am also concerned about the quality of the water that supplies the city. Construction of transmission lines will create silt and pollute runoff into the rivers and lakes. Erosion will strip the top soil of nutrients and adversely impact vegetation and wildlife.

PLEASE modify existing powerlines to carry the extra load, and leave the watershed alone.

Dina Winkel.

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Wednesday, September 12, 2001 7:59 AM
To: Kuehn, Ginny -KC-7
Cc: Lynard, Gene P - KEC-4
Subject: FW: Cedar River Powerline, Kangley - Echo Lake

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KCLT-404

RECEIPT DATE:

SEP 12 2001

-----Original Message-----

From: sierrasb@oz.net [mailto:sierrasb@oz.net]
Sent: Monday, September 10, 2001 3:02 PM
To: lcdriessen@bpa.gov
Subject: Cedar River Powerline

TO:
Bonneville Power Administration
PO Box 3621
Portland, OR 97208
lcdriessen@bpa.gov

FROM:
Shelly Baur
3926 SW Southern St.
Seattle, WA 98136

DATE: September 10, 2001

Dear BPA:

Seattle celebrated the protection of the Cedar River watershed, which I had thought would be protected for 50 years. Now, I find that BPA is undermining this protection with a proposed powerline. I want this to stop.

1. This powerline is not necessary. BPA has not done all it can and should to conserve energy. Energy conservation was not pursued wholeheartedly during the 90s until the California energy crunch, and building powerlines through vital watersheds is not the answer to catching up.
2. I don't believe all alternatives to such a powerline have been exhausted such as lines through corridors already cut.
3. Your environmental impacts were not adequately assessed. I would like a new environmental impact statement done that looks at the watershed and its areas with the affects of all factors represented over time. This assessment should include alternatives.
4. You have not even attempted adequate mitigation for the proposed damage. If in the future such a line goes through, the forest, wetlands, riparian corridors, etc. should be bought from private landowners in at least a 2 for 1 exchange so the public is compensated for its loss. This is necessary also in part so BPA has the full cost of such a project as part of its cost/benefit analysis. If included, I believe that the current costs outweigh the benefits of the project as proposed and BPA will instead up the ante on conservation and alternative transmission measures.

So, do not build the line at this time.

Sincerely,

Shelly Baur

P.S.: Sorry I missed the official public comment period, but I do not feel BPA adequately advertised its intentions to the public, knowing how outraged we would be if it were well known. In future, I would like to see BPA advertise this more.

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: KELT-406

RECEIPT DATE: SEP 18 2001

DEAR MR. DRIESSEN,

PLEASE CONSIDER ENCOURAGING BPA TO PURCHASE
AND PRESERVE AN EQUIVALENT AMOUNT OF
LOW ELEVATION FORESTLAND THAT WOULD REPLACE
THE LOSS OF HABITAT IN CEDAR RIVER FOREST.
4 OUT OF 5 SALMON AGREE... IT'S THE RIGHT THING
TO DO!



THANK YOU
BPA!

SINCERELY,

Clifford J. Lee

RANDY SILL
2426 WESTLAKE
SEATTLE, WA. 98149



LOU DRIESSEN
BONNEVILLE POWER ADMINISTRATION
P.O. Box 3621
PORTLAND, OR 97208-3621

TWP-3



RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-407</i>
RECEIPT DATE: SEP 27 2001

1619 21st Ave. E.
Seattle, WA 98112
September 9, 2001

Mr. Lou Driessen
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Dear Mr. Driessen:

I thought that we locals had secured our watershed against any further logging. The sentiment against the Seattle Water Department's plan to keep rates down by continuing logging in the watershed ultimately prevailed. I assumed that was the end of it. Now it appears that the BPA wants to cut a wide swath through the watershed for a new power line. I am sure there are other routes for such a line. I hope you find such an alternative. I am opposed to the current BPA proposal.

Sincerely,



Christian Melgard

1932 Eleventh Avenue East
Seattle, Washington 98102

September 10, 2001

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>KELT-408</i> RECEIPT DATE: SEP 27 2001
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Mr. Lou Driessen
Bonneville Power Administration
P.O. Box 3621
Portland, WA 97208-2621

Dear Mr. Driessen:

I am writing you to express my concern about BPA's intention to build a new power line in eastern King County. I am afraid it will destroy hundreds of acres of protected forest in the City of Seattle's Cedar River watershed. I understand that it will cross the salmon bearing Raging River and the future salmon bearing Cedar River. I also understand BPA intends to build new roads and expand the Echo Lake substation.

Mr. Driessen, I do not feel the Bonneville Power Administration has fully investigated the potential environmental damage this project will cause. Perhaps your Environmental Impact Study has not gone far enough. Do you fully understand the importance of the Cedar River forest? Or the cumulative effects of power lines which destroy and fragment OUR forests?

The construction of new power lines should require the replacement of damaged habitat. BPA should be required to acquire and preserve an equivalent amount of forestland elsewhere, perhaps some that is at risk of being developed commercially. I feel that BPA should bear the full REAL cost of building these power lines and not ignore the loss of important habitat for forest animals.

Please take our comments into consideration as you formulate BPA's strategy for expanding power service thru OUR forests.

Very truly yours,



David N. James

Kuehn, Ginny -KC-7

From: Driessen, Laurens C - TNP-3
Sent: Thursday, September 27, 2001 3:10 PM
To: Kuehn, Ginny -KC-7; Lynard, Gene P - KEC-4
Subject: FW: Please Protect the Cedar River Watershed

RECEIVED BY BPA
PUBLIC INVOLVEMENT

LOG#: KELT-410

RECEIPT DATE:

SEP 27 2001

-----Original Message-----

From: Lisa Ramirez [mailto:lr Ramirez@foe.org]
Sent: Thursday, September 27, 2001 2:24 PM
To: jim.compton@ci.seattle.wa.us; richard.conlin@ci.seattle.wa.us;
jan.drago@ci.seattle.wa.us; margaret.pageler@ci.seattle.wa.us;
peter.steinbrueck@ci.seattle.wa.us; heidi.wills@ci.seattle.wa.us;
diana.gale@ci.seattle.wa.us; mayors.office@ci.seattle.wa.us;
lcdriessen@bpa.gov
Subject: Please Protect the Cedar River Watershed

To My Elected Officials,

Please do not allow the Bonneville Power Administration to cut into our Cedar River Watershed. Their plan to clearcut a 9-mile strip of forest would adversely impact the ecosystem and our drinking water -- all for a powerline. This is unacceptable, especially since BPA has not even provided any other viable options.

You already know the importance of this watershed. The Cedar River Watershed's fragile ecosystem is currently protected under an HCP. This area was threatened a few years ago by another logging proposal. To everyone's relief, the ecosystem was left in tact. Please do not allow the logging to go through this time!

We must protect what is left, for us, for future generations, and for the health of the planet. Please do the right thing and oppose BPA's destructive plan.

Thank you,
Lisa Ramirez
Seattle, WA